

EXHIBIT 17



3200 COBB GALLERIA PARKWAY
SUITE 265
ATLANTA, GA 30339

1 A. Swing State Consulting.

2 Q. Okay. What is Swing State Consulting?

3 A. It's a consulting firm that I formed
4 after Big Change Strategies.

5 Q. Are you -- is it an L.L.C. or --

6 A. Uh-huh.

7 Q. Okay.

8 A. Yes.

9 Q. Are you the only member?

10 A. Yes.

11 Q. Okay. Is it still active?

12 A. Yes.

13 Q. Does it have clients today?

14 A. Yes.

15 Q. Are the clients for Swing State
16 Consulting campaigns or are they independent
17 non-profits like New Georgia Project and Voter
18 Access Institute, or both?

19 A. Yeah. Independent projects.

20 Q. Ms. Abrams declared her candidacy for
21 governor in 2017; is that right?

22 A. Yes.

23 Q. Okay. And what was your role with the
24 Abrams For Governor campaign?

25 A. I was the campaign manager.

1 team?

2 A. Dara Lindenbaum and additional attorneys
3 at Sandler Reiff. And then there were other
4 attorneys retained late that I cannot list.

5 Q. Sure.

6 What is your current role with Fair Fight
7 Action?

8 A. I serve as its C.E.O.

9 Q. Okay. And what is the purpose of Fair
10 Fight Action?

11 A. Fair Fight Action works to engage and
12 educate an electorate and advocate. And since the
13 2018 elections and the incredible voter suppression
14 that we have seen, that mission has been
15 significantly impacted.

16 And we've diverted a significant amount
17 of resources to fight voter suppression in terms of
18 expenditures and time, programs that we have
19 implemented to counteract the wrongdoing.

20 Q. And is Fair Fight Action, I mean, it's --
21 in a corporate sense, isn't it the Voter Access
22 Institute and it changed its name?

23 A. That's correct.

24 Q. It's the same corporate entity?

25 A. That's correct.

1 A. It could be with or without intent.

2 Q. Okay. Do you have any personal knowledge
3 of any member of the State Election Board
4 expressing an intent to target communities of color
5 or low income neighborhoods in voting policy?

6 A. I don't recall. I'm not sure.

7 Q. Okay. Do you have any personal knowledge
8 of then-Secretary Kemp expressing an intent to
9 disproportionately impact community of color
10 voters?

11 A. I can only recall a couple of statements
12 that were reported in the press about his concern
13 that lots of African-Americans were voting. I
14 believe there was something that he said that was
15 reported in the press of 2016, also something to
16 that effect that he said in 2018.

17 Q. Okay. Do you have any personal knowledge
18 of any statements he's made that indicate or
19 otherwise evidence an intent to intentionally
20 discriminate against persons of color?

21 A. I can't think of other statements
22 offhand.

23 Q. Okay. And the same for low income
24 voters?

25 A. Correct.

1 personal knowledge of someone being denied an
2 absentee ballot that they were otherwise entitled
3 to because of their race?

4 A. I can't give you a specific name offhand
5 except that I can, again, point you to all of those
6 many declarations and affidavits and then tens of
7 thousands of people we spoke to who were told they
8 had a funny name or spelling of their name or a
9 space in their name or a hyphen or some apostrophe
10 or all manner of things that had an intentional, in
11 my view had -- was intentionally meant to make it
12 harder for African-Americans, naturalized citizens,
13 et cetera, to vote.

14 Q. Okay. Do you have personal knowledge of
15 someone who went to vote early in person or
16 requested an absentee ballot or -- and was told
17 that they could not because of their race?

18 A. No.

19 MR. BELINFANTE: We can go off the
20 record for a second.

21 (Whereupon, a discussion ensued off
22 the record.)

23 (Whereupon, there was a brief
24 recess.)

25 (Whereupon, there was a luncheon

1 vendors, were they in state? Were they based
2 in-state or were they based on out of state, do you
3 know?

4 A. As of, like, their corporate headquarters
5 or the staffing? What do you mean?

6 Q. I guess they could always move here once
7 they get the contract. But prior to the contract,
8 were they in-state companies?

9 I'm not interested in a company that,
10 let's say, works everybody's here but it's a
11 Delaware company. I'm talking about in terms of --
12 well, let me ask you this way.

13 How did you decide which vendors to use
14 at the New Georgia Project?

15 MS. LAWRENCE-BUNDY: And Josh, let me
16 just object here. I feel like we're
17 getting pretty far afield from the claims
18 in this lawsuit, and particularly with
19 regard to New Georgia Project.

20 I'll let it go for a while, but I
21 just want to let you know that I'm
22 concerned about the direction we're
23 going, because I don't quite see how it
24 relates to Ms. Groh-Wargo's testimony in
25 her deposition today.

1 A. I don't recall.

2 Q. Let me draw your attention to the second
3 page. In the first [sic, second] full paragraph,
4 the second -- I'm sorry, third sentence reads:

5 "In addition, we will utilize
6 motivational messaging that has been
7 tested in Georgia with unregistered and
8 low propensity African-American and
9 Latinos around why voting matters, using
10 themes of voter suppression, educational
11 opportunities for kids, healthcare,
12 hospital closures and Medicaid
13 expansion, and economic opportunities
14 for adults of all ages."

15 Do you see that?

16 A. I do.

17 Q. Okay. And the date of this document, it
18 says at the top of Page 1, is Plans For Fall of
19 2014. Do you have any reason to believe that date
20 is inaccurate?

21 A. No.

22 Q. Okay. And do you individually know what
23 this was referring to in terms of voter suppression
24 in 2014?

25 A. Voter Access Institute did a poll. I

1 don't remember --

2 Q. I see.

3 A. -- all that was in there, but I do think
4 there were one or two questions related to voter
5 suppression.

6 Q. Okay. And do you know if the Voter
7 Access Institute still has a copy of that poll? Or
8 I should say, does Fair Fight currently maintain a
9 copy of the poll?

10 A. I believe so.

11 Q. Okay. I'll show you what we'll mark as
12 Exhibit 28.

13 (Whereupon, Defendant's
14 Exhibit 28 was marked for
15 identification.)

16 BY MR. BELINFANTE:

17 Q. Have you seen this document before?

18 A. Yes.

19 Q. Is this a Voter Access Institute
20 document, meaning, I should say, was it prepared
21 for Voter Access Institute?

22 A. Yes.

23 Q. Do you know, who is Field Strategies?

24 A. It's a vendor.

25 Q. And what do they do?

Voter Access Institute Fall 2014 Plans: Georgia 501(c)4

OVERVIEW

The need for voter registration and education in Georgia is stark. In 2013, Georgia was ranked Georgia 41st among all states in voter registration rate and 38th in voter turnout¹. The Voter Access Institute was formed in 2014 to address this problem and to work to improve the educational levels about voting of the most underrepresented communities in the state, specifically the growing African American, Latino and Asian America communities. In fall of this year, VAI is working to educate new registrants from these communities as well as infrequent progressive voters on the importance and ease of voting in the November general election.

Voter Access Institute Education and Mobilization Targets

New Registrants 110,000
 Infrequent Progressives 711,213
Voted in both 2008 and 2012 but not 2010

Georgia offers all voters three different ways to vote: by mail, in person at early voting centers in all counties, or on Election Day. It is critical that voters receive educational materials to understand the different voting options they have, and how to go about casting their ballot by their preferred method. Voters must provide a photo ID when voting in person. We will assist new registrants and currently registered voters who do not possess an appropriate ID with securing a free state-issued identification.

Progressive Voters by the Numbers

Tier	Description	People	Mailboxes	Phones
1	Voted in 2006, 2008 and 2012, but not 2010	187,384	169,544	155,737
2	Voted in 2008 and 2012, but not 2010	711,213	598,298	530,385
3	Voted in 2008 or 2012, but not 2010	2,225,544	1,517,534	1,378,161
Total		3,124,141	2,285,376	2,064,283

Gender

Male		Female	
229,659	39%	356,316	61%

Race

Af Am		Hisp		White		Other	
392,850	67%	14,279	3%	118,269	21%	60,218	9%

Defendant's
EXHIBIT - 27
 9/16/2019

¹ http://www.gafcp.org/sys_gafcp/doclib/news/CHI-Release2013.pdf

By Media Market

Albany GA	27,397	5%
Atlanta GA	370,538	63%
Augusta GA	34,451	6%
Chattanooga TN	7,599	1%
Columbus GA	22,543	4%
Dothan AL	1,177	0%
Greenville SC-Asheville NC	3,987	1%
Jacksonville FL	9,122	2%
Macon GA	47,957	8%
Savannah GA	43,877	8%
Tallahassee FL-Thomasville GA	17,418	3%
Total	586,066	

VOTER EDUCATION AND CONTACT OVERVIEW

Our goal is to execute a robust effort to educate and mobilize new registrants from the Rising American Electorate as well as progressives who tend to skip gubernatorial year elections. We will do this through a multi-layered approach that works in concert to contact these targets by mail, phone and at their doorstep starting in September and running through Election Day.

Our plan will deploy the types of messaging and tactics we know works with low propensity voters. Official-looking early vote request applications and social pressure messaging will be key. In addition, we will utilize motivational messaging that has been tested in Georgia with unregistered and low propensity African American and Latinos around why voting matters using themes of voter suppression; educational opportunities for kids; health care, hospital closures and Medicaid expansion; and economic opportunities for adults of all ages.

Field Strategies is currently operating a paid canvass collecting voter registration applications from four offices in Atlanta, Columbus and Savannah that can be easily adapted into a mobilization program. From these offices, canvassers are deployed into the counties in and around Atlanta, Macon, Albany, Savannah and Columbus. These teams have the ability to run short term canvassing in and around Augusta and other areas with a density of our targets. Depending on funding, various components of this field effort can be scaled up or down.

This plan has three phases:

1. **Vote by Mail:** Voters who request ballots will begin receiving them 45 days before the Election. Each request form sent to a targeted voter will be sandwiched with phone calls and will be part of the door knock universe. At least one of the calls will be live, so voters unfamiliar with voting by mail will be able to have their questions answered.

Canvassers can also carry postage-paid ballot applications with them to leave with voters. Georgia law also allows field staff to collect completed applications so long as they are returned immediately to the proper election office.

Once ballots begin arriving to our voters, we will implement an aggressive chase program, ensuring that our voters who have requested ballots don't forget to fill them in and return them. The program will consist of calls, door knocks and mail.

1. **Early Vote:** Targeted voters who did not vote by mail will be converted over to Early Vote in person efforts through additional phone and field contact and limited mail.
2. **Election Day:** For voters who do not successfully vote early by mail or in person, we'll educate them on their polling location and how to vote on Election Day.

BUDGET SUMMARY

TARGET	ACTIVITY	COST
Vote By Mail	Vote By Mail Mail	\$765,523
	Vote By Mail Phone	\$610,470
	Vote By Mail Field	\$627,187
SUBTOTAL		\$2,003,180
Early Voting	Early Vote Mail	\$270,300
	Early Vote Phone	\$180,525
	Early Voting Field	\$181,232
SUBTOTAL		\$209,232
Election Day/GOTV	Election Day Mail	\$270,300
	Election Day Phone	\$86,250
	Election Day Field	\$379,485
SUBTOTAL		\$820,035
Program Management, Legal Costs and Expenses		\$25,000
TOTAL PROGRAM COST		\$3,424,272

Defendant's

EXHIBIT- 30

9/16/2019

The cover features a background of a repeating geometric pattern of cubes and triangles in various shades of gray. A large, dark gray, abstract shape, resembling a stylized 'V' or a folded piece of paper, is positioned on the left side. The text 'VAI' is prominently displayed in a large, bold, black sans-serif font. To its right, the words 'VOTER ACCESS INSTITUTE' are written in a smaller, bold, black sans-serif font, stacked vertically. Below this, the word 'PROSPECTUS' is written in a larger, bold, black sans-serif font, with wide letter spacing.

VAI VOTER ACCESS INSTITUTE

PROSPECTUS



Voter Access Institute

Georgia Fall 2014 Voter Education and Mobilization

DRAFT PLAN

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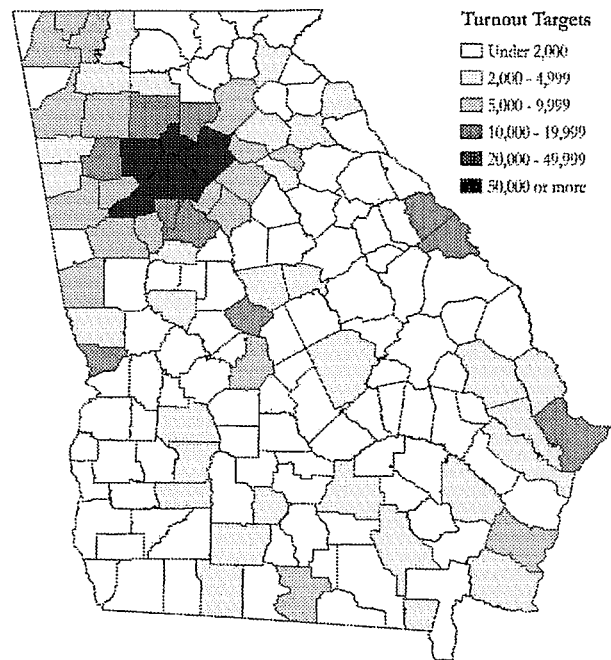
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P R O S P E C T U S



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SUBTOTAL		\$736,035
Catalist, VAN, Program Management and Legal Costs		\$55,000
TOTAL PROGRAM COST		\$3,361,272

P R O S P E C T U S



HOW TO CONTRIBUTE

The Voter Access Institute is a 501(c)4 organization. Contributions are not deductible for federal income tax purposes. Contributions are not subject to public disclosure.

To contribute by check:

Voter Access Institute
One West Court Square
Suite 750
Decatur, Georgia 30030

To contribute by wire:

Direct to Wire Routing Transit Number: [REDACTED]
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
BNF/Field 4200 (Account Number): [REDACTED]
Beneficiary Account: Voter Access Institute, Inc.

P R O S P E C T U S